RPS920010046 (44458-P015US)

PATENT

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BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES

-1-

In re Application of: Goodman et al.

Serial No.: 09/931,629

Filing Date: August 16, 2001

Title: FLASH UPDATE USING A TRUSTED PLATFORM MODULE

Before the Examiner: Chai, Longbit

Group Art Unit: 2131

Lenovo (United States) Inc.

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Mail Stop Appeal Brief - Patents Commissioner for Patents P.O. Box 1450 Alexandria, VA 22313-1450

REPLY BRIEF

In response to the Examiner's Answer having a mailing date of May 26, 2006, Appellants respond as follows:

The Examiner is asserting that the claims are obvious by combining the *Grawrock* reference with the *Alexander* reference. In order to do so, the *prima facie* case of obviousness has to show that one skilled in the art at the time the invention was made would have been motivated to combine these two references. Appellants

CERTIFICATION UNDER 37 C.F.R. § 1.8

I hereby certify that this correspondence is being deposited with the United States Postal Service with sufficient postage as first class mail in an envelope addressed to Mail Stop Appeal Brief - Patents, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on July 26, 2006,

Signature

Danielle Chandler

(Printed name of person certifying)